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**From:** Muneer, Alie [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DE7C5B1BEBF144E486D721FDFCF17DFA-AMUNEER]  
**Sent:** 9/17/2018 8:15:45 PM  
**To:** Kevin Gauthier [KGauthier@hauthaway.com]  
**CC:** Christopher Reuther [creuther@hauthaway.com]  
**Subject:** RE: P-18-0169 PPE question

Kevin: The stipulations are:

- Use of dermal protection (including impervious gloves)
- Use of respiratory protection (NIOSH certified respirator with APF 1000 for spray applications and APF 50 for no spray applications)
- No consumer use
- Manufacturing (including import) the PMN substance with triethylamine concentration no greater than 4% by weight
- APF 1000 for spray applications
- APF 50 for no-spray applications



Alie Muneer

USEPA Headquarters | OCSPP OPPT Chemical Control Division | WJC Building-East | 1200 Pennsylvania Avenue, N. W. |  
Mail Code: 7405M | Washington, DC 20460 | Ph# 202 564 6369 | Fax: 202 564 9490 | Email: [muneer.alie@epa.gov](mailto:muneer.alie@epa.gov) | Office hours:  
M-F, 8am to 4:30pm

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**From:** Kevin Gauthier <KGauthier@hauthaway.com>  
**Sent:** Monday, September 17, 2018 4:05 PM  
**To:** Muneer, Alie <muneer.alie@epa.gov>  
**Cc:** Christopher Reuther <creuther@hauthaway.com>  
**Subject:** RE: P-18-0169 PPE question

Alie,

After reviewing the redacted reports, Chris and I are more confused. It is not clear to us what stipulations you are asking of us to manufacture this product. It is our understanding that the sole stipulation initially was the requirement to manufacture with respiratory protection that had an assigned protection factor of 50. We understood that this was based on the note in our L3685 SDS for respiratory personal protection in Section VIII – Exposure Controls/ Personal Protection. That note is intended for an end user that may spray this product during the application process, which is not part of the manufacturing process. So, our question would be what requests/stipulations are there for Hauthaway to comply with in order for us to gain the approval for the manufacturing of this product? If we can understand this, we believe we can provide appropriate responses to any questions to the manufacturing process of this product.

Hope this helps,

Kevin

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**From:** Muneer, Alie [mailto:muneer.alie@epa.gov]  
**Sent:** Monday, September 17, 2018 9:13 AM  
**To:** Kevin Gauthier <KGauthier@hauthaway.com>  
**Cc:** Christopher Reuther <creuther@hauthaway.com>  
**Subject:** RE: P-18-0169 PPE question

Hello Kevin: The following weblink is our Points to Consider When Preparing TSCA New Chemical Notifications Document that you may find of use as you review the redacted reports I sent last week: [https://www.epa.gov/sites/production/files/2018-06/documents/points\\_to\\_consider\\_document\\_2018-06-19\\_resp\\_to\\_omb.pdf](https://www.epa.gov/sites/production/files/2018-06/documents/points_to_consider_document_2018-06-19_resp_to_omb.pdf)

Alie Muneer



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**From:** Kevin Gauthier <KGauthier@hauthaway.com>  
**Sent:** Thursday, September 13, 2018 1:02 PM  
**To:** Muneer, Alie <muneer.alie@epa.gov>  
**Cc:** Christopher Reuther <creuther@hauthaway.com>  
**Subject:** RE: P-18-0169 PPE question

Hello Alie,

The fax number is 781-595-5673. Also, it looks like the Doodlepoll is not matching up too well. We could choose other dates if not all your people listed are critical to the meeting. Just let me know.

Regards,

Kevin

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**From:** Muneer, Alie [mailto:muneer.alie@epa.gov]  
**Sent:** Thursday, September 13, 2018 12:41 PM  
**To:** Kevin Gauthier <KGauthier@hauthaway.com>  
**Subject:** RE: P-18-0169 PPE question

Pls advise your fax number so I can fax the redacted reports to you today.



Alie Muneer

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**From:** Kevin Gauthier <[KGauthier@hauthaway.com](mailto:KGauthier@hauthaway.com)>  
**Sent:** Thursday, August 30, 2018 4:06 PM  
**To:** Muneer, Alie <[muneer.alie@epa.gov](mailto:muneer.alie@epa.gov)>  
**Cc:** Christopher Reuther <[creuther@hauthaway.com](mailto:creuther@hauthaway.com)>  
**Subject:** P-18-0169 PPE question

Hello Alie,

As we discussed, I am forwarding comments from our Environmental, Health and Safety Manager. It would be best to contact Chris directly if all the concerns are not addressed. I have attached the Sigma Aldrich SDS that he refers to below.

Regards,

Kevin Gauthier  
Technical Director  
Hauthaway  
638 Summer St.  
Lynn, MA 01905  
781-592-6444

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**From:** Christopher Reuther  
**Sent:** Thursday, August 30, 2018 3:47 PM  
**To:** Kevin Gauthier <[KGauthier@hauthaway.com](mailto:KGauthier@hauthaway.com)>  
**Subject:** PPE Follow up Question

Good Afternoon Kevin,

I wanted to respond to your inquiry about using an air purifying respirator, and fit testing employees to provide an APF of 50 for the addition of pentaerythritol tetraacrylate to a vessel through a spigot attached to a drum. After reviewing the hazards of the chemical on various safety data sheets I do not find it necessary to require our employees to wear an APR with an APF of 50 based on the hazard data and the similarities to other chemicals. If you review the Sigma Aldrich SDS for PPE it makes some basic recommendations for PPE which we are already doing per OSHA and chemical handling. Aside from this, with no PEL being indicated by OSHA and no REL by NIOSH there is no real guide as to what type of protection would be necessary and an APF of 10 could be more than adequate if we needed to do so. Please let me know if this clarifies things a bit more and if there are any further questions please let me know.

Thanks,  
Chris

Christopher Reuther  
C.L. Hauthaway  
Environmental, Health and Safety Manager  
638 Summer Street

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